## EXHIBIT 2

From: Rob Snyder

**Sent:** Wednesday, August 02, 2017 5:47 PM **To:** 'Davidson, Scott' <SDavidson@KSLAW.com>

Cc: Steinberg, Arthur <ASteinberg@KSLAW.com>; Wheaton, Jill (JWheaton@dykema.com)

<JWheaton@dykema.com>; 'Cooney, Michael (MCooney@dykema.com)' <MCooney@dykema.com>;
Brad Marsh <brad.marsh@swiftcurrie.com>; Jim Butler <jim@butlerwooten.com>; Joseph Colwell

<Joseph@butlerwooten.com>; Beth Glen <beth@butlerwooten.com>; Kim McCallister

<kim@butlerwooten.com>; Sarah Andrews <sarah@butlerwooten.com>

Subject: RE: Reichwaldt v. General Motors LLC; US District Ct for ND Ga., Case No. 16-02171

## Mr. Davidson:

As promised, attached please find Plaintiff's redline of her Complaint, which, when all changes are accepted, will become Plaintiff's First Amended Complaint and will be filed in the Northern District of Georgia as such. This editing of the original Complaint satisfies all the demands made by you on behalf of GM LLC – except with regard to the contract assumption issue, which, as we have stated in filed pleadings, is an issue for Judge Glenn to decide.

If you have other complaints, please send them to us promptly.

Please advise Judge Glenn that GM LLC is withdrawing all of its "motion to enforce" except that part thereof that asks for a ruling from Judge Glenn regarding the contract assumption issue (whether GM LLC assumed liability for punitive damages based upon GM Corp's conduct). As noted in our response to GM LLC's "Notice" filed in the Northern District yesterday, that is an issue for Judge Glenn to decide. GM having raised that issue with Judge Glenn, we likewise seek his ruling thereon, from which one party or the other can appeal.

As previously stated, Kaitlyn Reichwaldt does not seek, and will not seek, to recover any damages from GM LLC to which she is not legally entitled, according to Court rulings.

**Rob Snyder** 

Robert H. Snyder Attorney at Law

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From: Davidson, Scott [mailto:SDavidson@KSLAW.com]

**Sent:** Friday, July 14, 2017 3:13 PM

To: Jim Butler <jim@butlerwooten.com>; Rob Snyder <Rob@butlerwooten.com>; Joseph Colwell

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Brad Marsh < brad.marsh@swiftcurrie.com >

Subject: Reichwaldt v. General Motors LLC; US District Ct for ND Ga., Case No. 16-02171

Counsel:

Please see the attached correspondence in connection with the above-referenced matter.

Thank you Scott Davidson

Scott I. Davidson | King & Spalding LLP